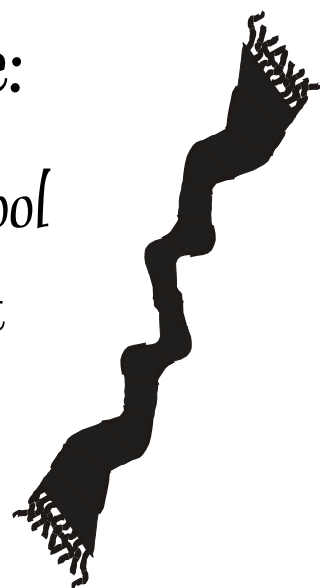
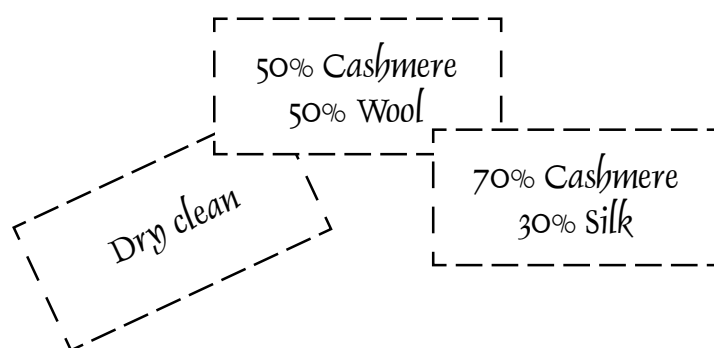


FTC FACTS for Business

The Cachet of Cashmere:

Complying with the Wool Products Labeling Act



Cashmere.

The word evokes images of luxury, warmth and softness. The ultra-fine wool, from the undercoat of the Cashmere (or Kashmir) goat, is indeed a premium fiber — one that generally commands a much higher price than sheep's wool.

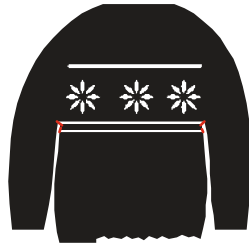
If you manufacture or sell clothing or household items that contain any wool, including specialty wools like cashmere, camel hair, mohair, alpaca, llama, or vicuna, you must comply with the Wool Products Labeling Act. That means your product labels must accurately reflect the items' fiber content, the country of origin, and the name of the manufacturer or marketer. Apparel items also must be labeled to show a safe cleaning method.

Fiber Content Disclosure

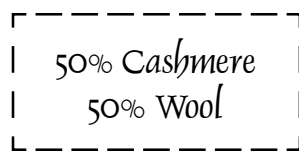
Product labels must reflect the true fiber content of the item.

For example, if a sweater is made of wool, it can be labeled as *100% Wool*, assuming it contains only wool.

Likewise, if a sweater is made only of cashmere, it can be labeled as *100% Cashmere*. But if a sweater contains cashmere mixed with sheep's wool, the label must accurately disclose both fibers, such as *80% Wool, 20% Cashmere*. It's illegal to simply say *Wool* or *Cashmere*; the percentages must be stated. There is one exception — the word *All* can be used in place of *100%* if the product is made of only one fiber, as in *All Wool* or *All Cashmere*.



If a claim about the fiber content appears elsewhere on the garment, such as on a hangtag or a sleeve label, it must mirror the garment's fiber content label. For example, a coat labeled *50% Cashmere, 50% Wool* cannot have a hangtag or a sleeve label stating merely *FINE CASHMERE GARMENT* or *FINE CASHMERE BLEND*. In this instance, the hangtag or sleeve label also must say *50% Cashmere, 50% Wool* — in equally conspicuous lettering.



The Textile Act allows a three percent tolerance for fiber content claims, but the Wool Products Labeling Act doesn't. However, the Wool Act says that deviation from the stated fiber content is not considered mislabeling *if* it results from “unavoidable variations” in the manufacturing process that occur despite the

exercise of due care. For this reason, the FTC generally will apply the three percent tolerance to wool products. The three percent tolerance does not allow for intentional mislabeling. No tolerance is allowed for a 100% claim, as the addition of another fiber would always be intentional.

Testing is Important

You're responsible for label accuracy, even if you import, distribute or sell wool products manufactured by another company. You cannot necessarily rely on an invoice statement that the goods contain a specified amount of cashmere. Routine testing of fiber contents by a qualified, independent testing lab is the best assurance of accurate labels.

A trained expert, using an optical or electron microscope, can distinguish between cashmere fibers and sheep's wool fibers, following procedures established by the American Association of Textile Chemists and Colorists (AATCC) or the American Society for Testing and Materials (ASTM). The basic distinction is not only one of diameter, as some sheep have now been bred to produce ultra fine fibers — with a diameter comparable to that of cashmere fibers. There are significant differences in the scale structure of the two fibers, and that is what the test expert looks for under the microscope.

Guaranty of Compliance

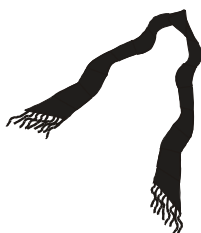
If you buy and resell wool or cashmere products, you can ask your U.S. supplier for a “guaranty of compliance.” The guaranty is a written statement on a product invoice or other dated document that states: “We guarantee that the wool products specified herein are not misbranded under the provisions of the Wool Products Labeling Act and rules and regulations thereunder.”

In other words, the supplier guarantees that the wool and cashmere products sold to you are correctly labeled under the Wool Labeling Act. The guaranty must have the name and address of the guarantor. A “continuing guaranty,” which covers *all* wool products sold by the guarantor, also can be filed with the FTC. Filing such a guaranty is an assurance by the guarantor that all of its products covered by the Wool Act are correctly labeled. A buyer who in good faith relies upon a properly executed guaranty will not be found in violation of the law if the goods are later determined to be mislabeled. **Note**, that *good faith* means acting prudently and not ignoring an indication (such as price or appearance) that an item may not be accurately labeled.

A special note about guaranties and foreign companies: A foreign company cannot file a continuing guaranty with the FTC. In addition, a guaranty from a foreign company is not a legal defense if the importer is charged with mislabeling products. A U.S. importer is legally responsible for the proper labeling of imported textile and wool products. Importers should test the fiber content of imported goods periodically to verify the accuracy of the label.

How Posh is Pashmina?

The popularity of products marketed as *pashmina* — an Indian word for *cashmere* — has skyrocketed in recent years; yet most consumers aren’t sure what *pashmina* is. That’s not surprising, as *pashmina* is not a labeling term recognized by the Wool Act and rules. Experts tell the FTC there is no *pashmina* fiber that is separate and distinct from the cashmere fiber.



Some manufacturers use the term *pashmina* to describe an ultra fine cashmere fiber; others use the term to describe a blend of cashmere and silk. The FTC encourages manufacturers and sellers of products described as *pashmina* to explain to consumers, on a hangtag, for example, what they mean by the term.

As with all other wool products, the fiber content of a shawl, scarf or other item marketed as *pashmina* must be accurately disclosed. For example, a blend of cashmere and silk might be labeled *50% Cashmere, 50% Silk* or *70% Cashmere, 30% Silk*, depending upon the actual cashmere and silk content. If the item contains only cashmere, it should be labeled *100% Cashmere* or *All Cashmere*. The label **cannot** say *100% Pashmina*, as *pashmina* is not a fiber recognized by the Wool Act or regulations.



Other Requirements

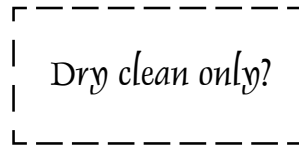
The label must state the country of origin and the identity (name or Registered Identification Number – RN) of the manufacturer or another business responsible for marketing the item, in addition to the fiber content. For further information about the labeling of textile and wool products, see the FTC booklet *Threading Your Way Through the Labeling Requirements Under the Textile and Wool Acts*.

Care Labels

Apparel care labels are required under the FTC’s Care Labeling Rule. For information on complying with this rule, see *Writing a Care Label: How to Comply with the Amended Care Labeling Rule*.

Facts for Business

Dry clean only? Many cashmere items are labeled *Dry Clean Only*. If your label says *Dry Clean Only*, you are telling consumers that the item can't be washed safely. To be accurate, you must have proof that the garment will be harmed by washing.



The truth is that many cashmere items can be washed safely at home. A label that says *Dry Clean* does not warn against washing and does not require proof that washing would harm the item.

For clothing that may be washed or dry cleaned, you must give instructions for at least one cleaning method. Of course, you may provide information about both cleaning methods. Consumers are telling the FTC that's what they want. Many consumers prefer to wash items that can be laundered at home.

For More Information

If you have further questions about the Textile or Wool Acts, visit the FTC website at www.ftc.gov on the Web — click on **Business Guidance**, then **Textile, Wool, Fur, & Apparel Matters**.

Or call the Textile Information Line: 202-326-3553 (contains recorded information about textile, wool and RN matters)

For copies of this and other publications, contact: Consumer Response Center, Federal Trade Commission, Washington, DC 20580; toll-free 1-877-FTC-HELP (382-4357).

For more information about cashmere and other specialty wool products, contact: Cashmere & Camel Hair Manufacturers Institute, 230 Congress Street, Boston, MA 02110-2409; www.cashmere.org

Your Opportunity To Comment

The Small Business and Agriculture Regulatory Enforcement Ombudsman and 10 Regional Fairness Boards collect comments from small business about federal enforcement actions. Each year, the Ombudsman evaluates enforcement activities and rates each agency's responsiveness to small business. To comment on FTC actions, call 1-888-734-3247.



Federal Trade Commission
Bureau of Consumer Protection
Office of Consumer and Business Education

December 2000